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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

## JN RE PLUM BABY FOOD LITIGATION

Case No. 4:21-cv-00913-YGR

Hon. Yvonne Gonzalez Rogers

This Document Relates To: ALL ACTIONS

**STIPULATED REQUEST AND  
[PROPOSED] ORDER TO MODIFY  
CASE SCHEDULE**

Pursuant to Civil Local Rule 6-2, Plaintiffs Sarah Brown, Josh Crawford, Jessica David, Autumn Ellison, Ludmila Gulkarov, Vanessa Mathiesen, Kelly McKeon, Tommy Nurre, and Janine Torrence (“Plaintiffs”) and Defendant Plum, PBC (“Plum”) (collectively, the “Parties”) respectfully submit this stipulated request to extend the current case schedule by approximately sixty (60) days for the reasons set forth below.

## STIPULATION

**WHEREAS**, on March 23, 2022, this Court issued a case schedule in its Order RE: Initial Case Management Conference (ECF No. 138), which set deadlines for expert disclosures and expert discovery, expert motions, and class certification motions;

**WHEREAS**, the Parties, through their respective counsel, have met and conferred regarding the deadlines in the existing case schedule;

**WHEREAS**, the Parties have been engaging are continuing to engage in fact discovery in good faith, including the production of documents and scheduling of depositions, and agree that each would benefit from additional time to continue to conduct such discovery, including prior to the deadlines for Plaintiffs' and Defendant's expert disclosures and therefore request a modest 60-day extension of time, and resulting adjustment of the remaining deadlines, for that purpose;

**WHEREAS**, this is the second modification to the case schedule. On July 21, 2022, the Court granted the Parties' Stipulated Request to Extend the Deadline to Complete Mediation, from July 29, 2022, to August 22, 2022 (ECF No. 150);

**WHEREAS**, this requested extension is not made for the purpose of delay, promotes judicial efficiency, and will not cause prejudice to the respective Parties;

**NOW, THEREFORE, IT IS HEREBY STIPULATED** by and between the Parties, through their respective counsel and respectfully requested that the case be modified as set forth below.

Current Date	Proposed Date	Event
10/21/22	12/20/22	Plaintiffs' expert disclosures regarding class certification
12/16/22	2/14/23	Defendant's expert disclosures regarding class certification
1/27/23	3/28/23	Expert depositions and Class Certification Expert Discovery Cutoff
2/14/23	4/17/23	Motion for Class Certification
3/28/23	5/30/23	Opposition to Class Certification and Defendant's Daubert Motions
4/18/23	6/20/23	Reply in Support of Class Certification and Plaintiff's Daubert Motions
4/26/23	6/26/23	Opposition to Defendant's Daubert Motions
5/9/2023	7/10/23	Defendant's Reply in Support of Daubert Motion
5/17/23	7/17/23	Opposition to Plaintiff's Daubert Motions
6/6/23	8/7/23	Reply in Support of Plaintiffs' Daubert Motions
6/27/23	8/29/23	Hearing on Class Certification/Daubert Motions

STIPULATED TO AND DATED this 6th day of October, 2022.

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1                   **CERTIFICATION OF COMPLIANCE WITH N.D. Cal. L.R. 5-1(i)(3)**

2                   I hereby certify that pursuant to N.D. Cal. L.R. 5-1(i)(3), I have obtained the authorization  
3 from the above signatories to file the above-referenced document, and that the above signatories  
4 concur in the filing's content.

5                   I certify under penalty of perjury under the laws of the United States of America that the  
6 foregoing is true and correct.

7  
8                   Dated: October 6, 2022

By: Charles C. Sipos  
Charles C. Sipos

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~~[PROPOSED] ORDER~~

Pursuant to the stipulation of the Parties hereto, the Court GRANTS the Parties' request and AMENDS the case schedule as follows:

Date	Event
12/20/22	Plaintiffs' expert disclosures regarding class certification
2/14/23	Defendant's expert disclosures regarding class certification
3/28/23	Expert depositions and Class Certification Expert Discovery Cutoff
4/17/23	Motion for Class Certification
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7/17/23	Opposition to Plaintiff's Daubert Motions
8/7/23	Reply in Support of Plaintiffs' Daubert Motions
8/29/23	Hearing on Class Certification/Daubert Motions

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: October 11, 2022

  
HONORABLE YVONNE GONZALEZ ROGERS  
U.S. DISTRICT COURT JUDGE